



# Legislative Department Seattle City Council

October 14, 2003

Rear Admiral J.M. Garrett  
Responsible Official  
Commander, 13<sup>th</sup> Coast Guard District  
915 Second Avenue, Room 3510  
Seattle, WA 98174-1067

Mr. Ross Macfarlane  
Director, Legal & Environmental Affairs  
Seattle Monorail Project  
1904 Third Avenue, Suite 105  
Seattle, WA 98101

Dear Admiral Garret and Mr. Macfarlane:

We understand that an Environmental Impact Statement (EIS) is required under RCW 43.21C.030 (2)(c) and the National Environmental Policy Act (NEPA), and that on August 20, 2003 the Seattle Monorail Project (SMP) published a Draft EIS (DEIS), and is currently accepting comments on that document. We recognize the work that the SMP has done in preparing the DEIS document, and in conducting public outreach and soliciting comment on your environmental review, and believe that it is important for Councilmembers to offer comments on the DEIS.

The Executive branch of Seattle City government will be submitting comprehensive comments to the SMP on the DEIS. The following comments are intended to supplement those you will receive from the Executive, and to highlight areas that should be addressed in the Final EIS (FEIS).

A central issue of concern to the Council is how the DEIS identifies where mitigation is, or may be, required, and how the DEIS states the SMP's commitment to mitigate project impacts. Throughout the document there are instances either where the DEIS identifies an impact without stating clearly that it will be mitigated or where the document identifies an impact, states that it could be mitigated, but does not specify how. In those instances where the SMP believes that there will be adverse impacts that require mitigation, the text should read that impacts "will" be mitigated rather than "could" be mitigated – there should be no ambiguity for the public reading the FEIS that the adverse impact will be mitigated.

Additionally, the DEIS states that the SMP is only required to mitigate impacts directly adjacent to station locations, and cites City Council Resolution 30486 as the foundation for this assertion. However, Resolution 30486 states that the City will require the SMP to mitigate *"any significant adverse impacts that may be caused by the monorail project as identified in a final, project-level environmental impact statement. These elements may include improvements adjacent to but outside the perimeter of the monorail system itself that are integral to making the monorail a well-functioning part of the overall transportation system and the urban environment."*

The City Council concurs with the Mayor's September 16, 2003 letter stating that the SMP's responsibility for mitigation cannot be limited to areas adjacent to the monorail system, but must include a broader "scope of influence." The intent of Resolution 30486 was to insure that the SMP would not shoulder the cost of "extraneous or extraordinary investments in neighborhood or community

development” projects, not to limit its responsibility for mitigating legitimate impacts to a narrow physical envelope around the system. The SMP should ensure that adverse impacts of the monorail are mitigated, and that the monorail system is well integrated with the existing transportation systems (Metro, bike paths, pedestrian facilities, planned light rail stations, etc.) and designed to facilitate neighborhood access to the stations – this may include making improvements to the right-of-way that are outside the immediate surroundings of the monorail stations but that are essential to getting riders to the stations.

With respect to the Transportation section of the DEIS, the Council would like to make several comments. On September 15, 2003 the Council adopted Resolution 30628 supporting a monorail system that integrates Seattle's existing bicycle routes, provides adequate bicycle storage at stations, and provides for bicycles to travel on monorail cars. The DEIS does not assume that there will be space for bicycle storage at downtown stations. We believe that all station options studied in the FEIS, including downtown stations, should have storage space for bicycles. Also, where the monorail may temporarily or permanently displace existing bike lanes, the FEIS should identify alternative bike lanes or commit to replacing them as mitigation.

The analyses of ridership and traffic impacts in the DEIS assume that King County Metro will provide feeder bus service to Monorail stations and truncate several bus lines. Because this assumption is critical to the ridership projections, and thus future revenues for the SMP, the SMP should demonstrate in the FEIS, perhaps through inclusion of an operating Memorandum of Understanding with King County Metro as an appendix, that there is coordination between the SMP and Metro and resources to achieve an integrated transit system that delivers the projected ridership.

Stations in residential neighborhoods are likely to have “hide and ride” impacts, and these impacts are likely to be significant at the terminal stations in Ballard and West Seattle, affecting the surrounding neighborhoods and private unregulated parking lots near the stations. While the DEIS does discuss these impacts, the FEIS needs to identify those stations where “hide and ride” impacts will likely occur and clearly describe how the SMP will go about mitigating those impacts in collaboration with the City.

The City of Seattle values parks and the preservation of open space within the boundaries of the City. While the DEIS provides an inventory of park resources that may be affected by the Green Line, where the monorail will affect park property neither impacts nor mitigation strategies are clearly identified. The FEIS needs to identify how the monorail will affect park property, such as West Seattle Stadium, what property will need to be acquired, and how the SMP will replace that property consistent with Ordinance 118477, which requires that property replacing park land be of “equivalent or better size, value, location and usefulness in the vicinity, serving the same community and the same park purposes.”

Furthermore, the SMP must recognize that Longfellow Creek is an area where the City has made sizable investments to restore salmon runs and to create a valuable green space for residents of the city. The FEIS must thoroughly analyze visual impacts, analyze effects on storm water runoff and fish habitat, and identify appropriate mitigation measures for any adverse impacts that are identified.

Councilmembers have received correspondence from citizens across the city expressing concerns about how particular station locations and segments of the monorail alignment will affect residents and small businesses. Among these are the segment of alignment along Third Avenue in SODO, the station alternatives at Fifth Avenue and Bell Street, the various alignments around Seattle Center, and the two alternative alignments approaching Alaska Junction and the associated stations. Given the level of public concern about these areas, the SMP should be certain to thoroughly study the alignments and station locations, and consider the impacts to residents and small businesses.

In those instances where the SMP is considering new station locations that were not included in the DEIS, the SMP should include a thorough analysis of the station location in the FEIS and provide an opportunity for public comment on the station location through a public outreach process.



For many residents of Seattle, the most significant impact of this system will be the visual impact. While the DEIS analysis provides a great deal of information on the potential visual impacts of the system, it does not identify appropriate mitigation strategies. The FEIS should identify significant visual impacts where they occur, and suggest mitigation strategies where appropriate, or concede that some visual impacts cannot be mitigated.

Trees are an important element of Seattle's urban landscape, and a resource that the City has a stated interest in protecting. There are several segments of the alignment where the DEIS does not specify the exact number of trees that would be lost, nor does it characterize the types of trees that would be affected by various alignments. The FEIS should accurately identify the types and numbers of trees that could be affected by the monorail alignment, paying particular attention to identifying significant trees, consistent with the City's Significant Tree Ordinance (Ordinance 120410).

Given the high level of interest in the alignment alternatives under consideration at the Seattle Center, the analysis of the impacts at the Center needs to be as thorough as possible. Consequently, we suggest that the FEIS include more analysis in several areas.

- The SMP should analyze the impacts of event stations, including pocket tracks and switches, at the new Fifth Avenue station location, the Fifth and Broad 1 (Harrison) station location, and the Denny station location.
- A number of representatives from performance venues at Seattle Center continue to express concerns about potential noise and vibration impacts on both the Mercer and Seattle Center/Republican alignments. The SMP should use every reasonable means to satisfy the concerns of the representatives of these venues, and accurately identify noise and vibration impacts.
- The FEIS should identify impacts to Memorial Stadium, including how the presence of the monorail guideway and columns will affect uses on the stadium grounds and the effect of the monorail cars moving past the stadium during sporting and other events.
- Finally, the FEIS should identify the economic impacts to the Seattle Center, in terms of potential new revenue and lost or foregone revenue, from the demolition of the Northwest Rooms, displacement of rides at the Fun Forest, loss of trees and landscaping, and loss of parking places in the Fifth Avenue parking lot.

Thank you for your consideration of these comments. We look forward to working with you as this project moves forward.

Sincerely,



Peter Steinbrueck  
President, Seattle City Council

Nick Licata, Chair  
Neighborhoods, Arts, and  
Civil Rights Committee

Richard Conlin, Chair  
Transportation Committee



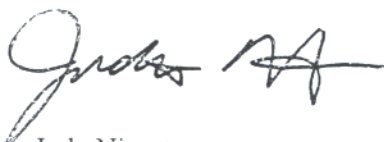
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